

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re:)
HIGHLAND PROPERTY, LLC) Case No. 23-22032
Debtor.) Chapter 11

OBJECTION TO THE DEBTOR'S MOTION TO APOINT REALTOR

This firm represents Creditor, Joseph Federer, who holds a secured claim against forty (40) properties owned by Debtor. Debtor, has filed a Motion to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 properties owned by the debtor which is returnable on December 9, 2024. Debtor has filed the motion to approve the transfer of thirty-two (32) properties which Joseph Federer holds a secured claim and which Joseph Federer would assume all unpaid real estate tax and municipal claims as to the properties conveyed to him. Joseph Federer entered into the agreement in reliance on Debtor's representations of the value of the properties and amounts owed as to the unpaid real estate tax and municipal claims. Subsequent to providing Joseph Federer with the values of the properties and the parties reaching an agreement, Debtor allowed Joseph Federer to inspect the properties which revealed that at least fifteen (15) properties were in a complete state of disrepair and were grossly misrepresented and overvalued by Debtor. Furthermore, it is believed and therefore averred that Debtor allowed his insurance policy on the properties to lapse. It is believed and therefore averred that the property known as 911 Crest Ave. (upper), Charleroi, PA 15022, suffered a fire which resulted in a complete loss of

the residence located at the property. As a result of the severe overvaluing of the properties and the loss of the uninsured property located at 911 Crest Avenue, Charleroi, PA 15022, approving the settlement as set forth in Debtor's Motion to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 would result in a severe detriment to Creditor, Joseph Federer. As such, Creditor, Joseph Federer, objects to the Motion to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 filed by Debtor.

Date: December 9, 2024

By: /s/ David B. Bassi

David B. Bassi, Esq.

Court I.D. 323306

I hereby certify that copies of this Objection to the Debtor's Motion to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 were served by ECF notice (electronically upon:

Debtor's Counsel:

Donald R. Calaiaro

Calaiaro Valencik

938 Penn Avenue, Suite 501

Pittsburgh, PA 15222-3708

Assistant US Trustee

Office of the United States Trustee

Liberty Center

1001 Liberty Avenue, Suite 970

Pittsburgh, PA 15222

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I, David B. Bassi, Esq., represent Creditor, Joseph Federer in this matter. On December 9, 2024, this office caused to be mailed a copy of the following pleadings and/or documents to the parties listed in the chart below:

- a. Objection to Debtor's Motion to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019

I hereby Certify that copies of the Objection to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 was served by ECF notice electronically upon

Debtor's Counsel:
Donald R. Calaiaro
Calaiaro Valencik
938 Penn Avenue, Suite 501
Pittsburgh, PA 15222-3708

Assistant US Trustee
Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

I hereby certify that copies of the Objection to Approve Settlement Pursuant to Federal Rule of Bankruptcy Procedure 9019 was served by USPS regular mail upon

HIGHLAND PROPERTY, LLC
1364 ROSTRAVER ROAD
BELLE VERNON, PA 15012

I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: December 9, 2024

By: /s/ David B. Bassi

David B. Bassi, Esq.
Court I.D. 323306